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Attorneys for Defendant  
COSTCO WHOLESALE CORPORATION

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ZOILA SIERRA, an individual,

Plaintiff,

vs.

COSTCO WHOLESALE CORPORATION, a  
Washington Corporation; EDDIE, an  
individual; and DOES 1-25, inclusive,

Defendants.

Case No.

[Alameda County Superior Court Case No.  
RG21106297]

**DECLARATION OF SHARON C.  
COLLIER IN SUPPORT OF  
DEFENDANT COSTCO WHOLESALE  
CORPORATION'S NOTICE OF  
REMOVAL TO FEDERAL COURT  
PURSUANT TO 28 U.S.C. § 1441(b)  
[DIVERSITY]**

Action Filed: July 23, 2021  
Trial Date: N/A

I, Sharon C. Collier, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before the United States District Court for the Northern District of California. I am a Member of the law firm of Severson & Werson. This firm has been retained to represent COSTCO WHOLESALE CORPORATION ("Costco"), which has been named as a defendant in a civil matter venued in Alameda County Superior Court of California as Case No. RG21106297.

2. I make this Declaration in support of Defendant Costco Wholesale Corporation's Notice of Removal to Federal Court Pursuant to 28 U.S.C. section 1441(b) [diversity]. I have personal knowledge of the matters set forth in this Declaration, and if called upon to do so, I could and would testify competently to same.

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1           3.       Plaintiff ZOILA SIERRA (“Plaintiff”) filed a Complaint for compensatory  
2 damages on July 23, 2021 in Alameda County Superior Court. I understand the Complaint was  
3 served on Costco’s Registered Agent on February 3, 2022. A true and correct copy of the  
4 Summons and Complaint served on Costco is attached to the Request for Judicial Notice served  
5 herewith as **Exhibit A**.

6           4.       Plaintiff served Defendant with a Statement of Damages on February 3, 2022. The  
7 Statement indicates that the damages claimed exceed \$75,000. A true and correct copy of this  
8 Statement is attached to the Request for Judicial Notice served herewith as **Exhibit B**.

9           5.       Costco is contemporaneously filing an Answer to the Complaint in Case No.  
10 RG21106297 of the Alameda County Superior Court. A true and correct copy of the Answer is  
11 attached to the Request for Judicial Notice served herewith as **Exhibit C**.

12           6.       Costco is the only named defendant to be served in this matter to date. I am not  
13 aware of Plaintiff effectuating service on the fictitiously named defendant, “Eddie,” or any other  
14 “Doe” defendants.

15           7.       Costco Wholesale is a corporation formed and organized under the laws of the  
16 State of Washington. A true and correct copy of the Amended Statement of Designation by a  
17 Foreign Corporation evidencing Costco’s citizenship in the State of Washington is attached to the  
18 Request for Judicial Notice served herewith as **Exhibit D**.

19           8.       Defendant Costco’s principal place of business is 999 Lake Drive, Issaquah,  
20 Washington 98027. A true and correct copy of the Statement of Information filed by Costco on  
21 June 27, 2019 with the California Secretary of State is attached to the Request for Judicial Notice  
22 served herewith as **Exhibit E**. This document evidences that Costco maintains its headquarters  
23 and principal place of business in the State of Washington

24           9.       Plaintiff alleges she is a resident of the State of California in her Complaint.

25           10.      Costco has been put on notice that Plaintiff allegedly sustained injuries to her  
26 person in the accident at issue, as alleged in the operative Complaint.

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11. Based on the allegations in the Complaint and the information disclosed in Plaintiff's Statement of Damages, I believe the amount in controversy exceeds the jurisdictional minimum of this Court.

12. Costco's Notice to Adverse Parties of Notice of Removal is being contemporaneously filed in Case No. RG21106297 of the Alameda County Superior Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This Declaration was executed on March 7, 2022, in Danville, California.

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Sharon C. Collier